

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BENSLEY CONSTRUCTION, INC., on its own
behalf and on behalf of all others similarly situated,

Plaintiff

v.

MARSH & MCLENNAN COMPANIES, INC.,
MARSH, INC., ACE USA, ACE INA, AMERICAN
INTERNATIONAL GROUP, AMERICAN
REINSURANCE COMPANY, ARTHUR J.
GALLAGHER & CO., HILB ROGAL & HOBBS,
COMPANY, WILLIS GROUP HOLDINGS, LTD.,
WILLIS NORTH AMERICA INC., WILLIS GROUP
LTD., UNIVERSAL LIFE RESOURCES,
UNIVERSAL LIFE RESOURCES, INC. (d/b/a ULR
INSURANCE SERVICES, INC.), THE CHUBB
CORPORATION, USI HOLDINGS, INC., METLIFE,
INC., PRUDENTIAL FINANCIAL, INC.,
UNUMPROVIDENT CORPORATION, THE ST.
PAUL TRAVELERS COMPANIES, INC., ZURICH
AMERICAN INSURANCE COMPANY, LIBERTY
MUTUAL GROUP INC., LIBERTY MUTUAL
INSURANCE COMPANY, LIBERTY MUTUAL
FIRE INSURANCE COMPANY, EMPLOYERS
INSURANCE COMPANY OF WAUSAU, and ST.
JAMES INSURANCE COMPANY LTD.,

Defendants.

FILING FEE PAID:

RECEIPT #

AMOUNT \$

BY DPTY CLK

DATE

Civil Action No.

05-11249 GAO

AUGUST 24, 2005

**MOTION FOR ADMISSION OF JEFFREY R. SEELY TO PRACTICE BEFORE THIS
COURT PRO HAC VICE**

Pursuant to this Court's Local Rule 83.5.3(b), Mark J. Claflin, a member in good standing of the Bar of this Court and counsel to defendants, ACE USA and ACE INA herein, hereby moves that Attorney Jeffrey R. Seely, a member in good standing of the Texas State Bar and the Bar of the United States District Court for the Southern and

Northern Districts of Texas and the Northern District of Illinois, be granted leave to appear on behalf of defendants ACE USA and ACE INA and practice in this Court *pro hac vice* in the above-captioned action.

As set forth in the accompanying Affidavit of Jeffrey R. Seely in support of this motion for admission *pro hac vice*:

1. Mr. Seely is a partner in the Houston, Texas offices of Suisman Godfrey LLP, 1000 Louisiana Street, Suite 5100, Houston, Texas 77002;
2. Mr. Seely is a member in good standing in every jurisdiction in which he is admitted to practice;
3. There are no disciplinary proceedings pending against Mr. Seely in any jurisdiction; and
4. Mr. Seely is familiar with the local rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Mark J. Claflin respectfully requests that this motion be allowed and that Jeffrey R. Seely be granted leave to appear on behalf of defendants, ACE USA and ACE INA and practice in t his Court *pro hac vice* in the above-captioned action.

THE DEFENDANTS,
ACE USA and ACE INA
By its Attorneys



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent to the following counsel of record by U.S. Mail, postage prepaid, this 24th day of August, 2005:

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Defendants.

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July 22 , 2005

**AFFIDAVIT OF JEFFREY R. SEELY IN SUPPORT
OF MOTION FOR ADMITTANCE PRO HAC VICE**

I, Jeffrey R. Seely, hereby depose and say of my personal knowledge:

1. I am an attorney licensed to practice in Texas and I am a partner in the
Houston, Texas offices of Suisman Godfrey LLP, 1000 Louisiana Street, Suite 5100,
Houston, Texas 77002.

2. I am a member in good standing and eligible to practice before the Texas State Bar and the Bar of the United States District Court for the Southern and Northern Districts of Texas and the Northern District of Illinois.

3. I am currently not suspended or disbarred in any jurisdiction, nor have I ever been suspended or disbarred from the practice of law.

4. I am not the subject of any pending disciplinary matters in any jurisdiction.

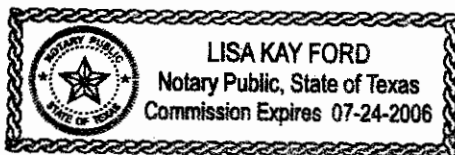
5. The defendants, ACE USA and ACE INA have asked me to represent them because of specialized knowledge and experience I have gained from representing them in the past.

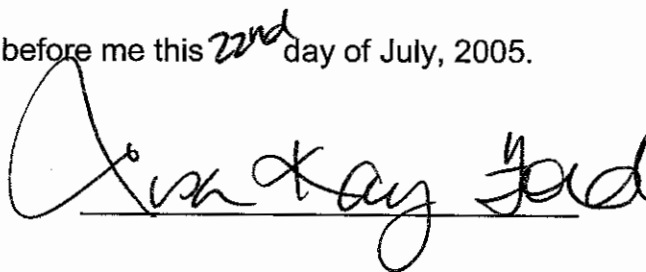
Signed under the pains and penalties of perjury this 22nd day of July, 2005.



Jeffrey R. Seely

Subscribed and sworn to before me this 22nd day of July, 2005.





Lisa Kay Ford